

March 27, 2026

VIA IZIS

District of Columbia Zoning Commission
Office of Zoning
441 4th Street, NW, Suite 200-S
Washington, DC 20001

Re: **Z.C. Case No. 23-10B: Application for a Time Extension of the Design Review Approved in Z.C. Order No. 23-10 for 120 F Street, NW**

Dear Chair Hood and Members of the Commission:

On behalf of Georgetown University (the “**Applicant**” or “**University**”), we hereby request a two-year time extension of the Design Review approved in Z.C. Case No. 23-10 (the “**Original Order**”), as modified by Z.C. Case No. 23-10A (the “**Modified Order**,” together with the Original Order, the “**Order**”) to construct a 130-foot tall building with academic, office, clinic, and convening space (the “**Project**”) for the Georgetown University Law Center (the “**Law Center**”) at 120 F Street, NW (Square 569, portion of Lot 867) (the “**Property**”).¹ As discussed in more detail below, the Applicant meets all of the applicable standards for the extension request.

I. Background

The Property is located in Ward 6 and is part of the University’s Capitol Campus, which is bounded by H Street, NW, New Jersey Avenue, NW, 1st Street, NW, E Street, NW, and 2nd Street, NW (the “**Capitol Campus**”). The Property is on the southwestern portion of the Capitol Campus and shares a record lot with the Scott K. Ginsburg Sports and Fitness Center (“**Ginsburg Sports and Fitness Center**”) and the Eric E. Hotung International Law Building (“**Hotung**”). The record lot includes approximately 76,224 square feet of land area. The Property is located in the D-3 Zone.

The Order granted Design Review approval pursuant to Subtitle I §§ 701.2 and 517.1(b) to allow an increased height of 130 feet in Square 569. The Property is currently improved with a residence hall, The Sarah and Bernard Gewirz Student Center (“**Gewirz**”), which the University plans to demolish. As approved by the Order, the Project consists of approximately 164,478 square feet of gross floor area (“**GFA**”); approximately 21 below-grade vehicle parking spaces; and a habitable penthouse to be used for convening space for hosting events. The program consists of classroom space, office space for faculty and the Law Center’s clinics, and event space. The northeast corner of the ground floor features publicly accessible retail or café space. The Project

¹ The Property is also part of Record Lot 83.

will connect directly to the Ginsburg Sports and Fitness Center and a pedestrian walkway will be constructed over Chews Court alley to connect with the McCourt School of Public Policy to the south of the Property. The Modified Order approved a special exception pursuant to Subtitle C § 807 to eliminate the minimum required bicycle parking requirements for the Project and instead permit flexibility to aggregate the required parking into a broader bicycle parking plan applicable to the Law Center as a whole.² The Modified Order also approved upper-story building identification signage.

The Order requires the University to file a building permit application by April 5, 2026.

II. The Commission Should Grant the Requested Time Extension

A. Standards of Review of Time Extension Request

The standards for a time extension are enumerated in Subtitle Z § 705.2 of the Zoning Regulations. The Commission is authorized to extend a PUD provided that:

- (a) The extension request is served on all parties to the application by the applicant and all parties are allowed thirty (30) days to respond;*
- (b) There is no substantial change in any of the material facts upon which the Commission based its original approval of the application that would undermine the Commission's justification for approving the original application; and*
- (c) The applicant demonstrates with substantial evidence one (1) or more of the following criteria:*
 - (1) An inability to obtain sufficient project financing for the development, following an applicant's diligent good faith efforts to obtain such financing, because of changes in economic and market conditions beyond the applicant's reasonable control;*
 - (2) An inability to secure all required governmental agency approvals for a development by the expiration date of the order because of delays in the governmental agency approval process that are beyond the applicant's reasonable control; or*
 - (3) The existence of pending litigation or such other condition, circumstance, or factor beyond the applicant's reasonable control that renders the applicant unable to comply with the time limits of the order.*

² Pursuant to the Modified Order, the University will (a) replace seven existing serpentine style bicycle racks located on the Eleanor Holmes Norton Green with 32 inverted-U racks, for a total of 64 short-term bicycle spaces, and (b) replace eight existing serpentine style bicycle racks on the Dean Green with 45 new inverted U-shaped bicycle racks for a total of 90 short-term bicycle spaces.

B. Applicant’s Satisfaction of the Standards for Granting Time Extension

As discussed in more detail below and in the affidavit attached hereto as Exhibit D, the Applicant meets all of the standards for the requested time extension.

1. *The Extension Request is Served on all Parties to the Application.*

This request is being served on Advisory Neighborhood Commission 6E, as the “Affected ANC” and the only party to the Application. The Applicant asks that the Commission not place this request on its meeting agenda until after the 30-day notice period has lapsed.

2. *There is no Substantial Change to any of the Material Facts upon which the Commission Based its Approval.*

There has been no substantial change in any of the material facts that would undermine the basis for the Commission’s approval of the Order. Furthermore, there have been no changes to the Zoning Regulations or the Comprehensive Plan that would adversely impact the material facts upon which the Commission based its original approval.

3. *There is Good Cause for the Extension.*

Following approval of the Order, the University moved forward with advanced design of the Project and completed construction drawings in 2024. Despite these diligent efforts, by the time the design was complete and the Project went out for bid, construction costs had already risen and the cost of the Project significantly exceeded earlier estimates. Construction costs have only continued to rise in the past two years, and the high cost of construction, labor, and materials have complicated the economics of the Project.

In light of these economic realities, the University is currently undertaking a redesign of the Project with the goal of reducing the total construction costs. Given the complexities of the building and the limited footprint, the University needs additional time to complete the redesign while ensuring that the Project remains within budget targets. Additional time is also necessary given recent leadership changes at the University, which will welcome both a new president and a new dean of the Law Center in Summer 2026. These new leaders should be given the opportunity to review and provide input on the redesign before it is finalized

Once these steps are complete, the University intends to return to the Commission to request a modification of the approved plans for the Project. The University remains committed to the Project and is actively pursuing the necessary approvals. The challenges posed by rising construction costs and a volatile market, coupled with changes in University leadership, necessitate the requested time extension. There is, therefore, good cause for the time extension and the University looks forward to continuing its efforts to ensure the Project’s completion.

III. Exhibits

Attached hereto are the following exhibits. A payment of \$2,142.40 for the filing fee will be provided concurrently with this filing under separate cover.

- Exhibit A – Application Signature Page
- Exhibit B – Authorization Letter
- Exhibit C – Prior Orders
- Exhibit D – Affidavit of Janice Szymanski

IV. Conclusion

For the foregoing reasons, the University requests that the Commission grant the requested time extension. Please feel free to contact the undersigned if you have any questions or comments regarding this application.

Sincerely,

/s/ David M. Avitabile
David M. Avitabile

/s/ Lee S. Templin
Lee S. Templin

Certificate of Service

The undersigned hereby certifies that copies of the foregoing documents will be delivered via electronic mail to the following addresses on March 27, 2026.

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